

1 **EXHIBIT 3**

2 **UNITED STATES DISTRICT COURT**
3 **DISTRICT OF NEVADA**

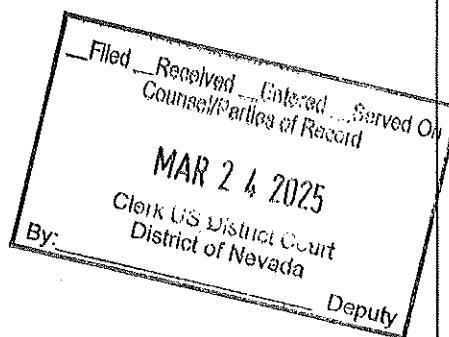
4 **DREW J. RIBAR,**
5 Plaintiff, Pro Se,

6 v.

7 **WASHOE COUNTY, et al.**

8 *Defendants.*

9 Case No.: 3:24-cv-00526-ART-CLB
10



11 **EXHIBIT 3**

12 **Title:** Internal Communications Regarding Media Access for Drag Queen Story Hour (DQSH)

13 **Date:** June 24, 2022

14 **Source:** Internal email correspondence among Washoe County Library System officials

15 **Bates Number Range:** EXH011 - EXH012

16 **DESCRIPTION**

17 This exhibit comprises internal emails among Washoe County Library System officials
18 discussing media access and restrictions regarding the Drag Queen Story Hour (DQSH).

19 **Key Correspondence Includes:**

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26 • *Jeff Scott (Library Director):* Discusses coordinating interviews with media
27 representatives and selectively permitting press access.

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PLEADING TITLE - 1

- 1 • *Jamie Hemingway (PIO)*: Consulted on whether media, including KUNR, should be
2 allowed to report on the event.
- 3 • *Beate Weinert (Youth Services and Library Event Manager)* Coordinates KUNR reporter
4 meeting with Christopher Daniel.
- 5 • *Kristen Ryan (Library Official)*: Engaged in discussions about the handling of press
6 inquiries.

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8 **Primary Concerns Addressed:**

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10 **1. Discriminatory Media Access:**

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- 12 ○ Library officials considered restricting media coverage, particularly from
13 journalists not aligned with their preferred narrative.
- 14 ○ The First Amendment prohibits viewpoint-based media exclusion from public
15 forums (see *Kreimer v. Bureau of Police*, 958 F.2d 1242 (3d Cir. 1992)).

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17 **2. Violation of Public Forum Doctrine:**

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- 19 ○ The emails suggest an effort to prevent certain individuals, including journalists,
20 from entering the event.
- 21 ○ This is inconsistent with *Southeastern Promotions, Ltd. v. Conrad*, 420 U.S. 546
22 (1975), which affirms that content-based restrictions on speech in public forums
23 must pass strict scrutiny.

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25 **3. Precedential Support for Free Press Protections:**

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- 27 ○ *Branzburg v. Hayes*, 408 U.S. 665 (1972): The press cannot be arbitrarily
28 restricted from access to public events.

1 o *Knight First Amendment Inst. v. Trump*, 928 F.3d 226 (2d Cir. 2019):
2 Government officials may not exclude individuals from otherwise public
3 communications based on viewpoint discrimination.

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7 RELEVANCE TO THE CASE

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9 • **First Amendment Violation:**
10 o The emails indicate selective restriction of media access based on viewpoint,
11 constituting unconstitutional censorship of the press.
12 • **Fourteenth Amendment Due Process Violation:**
13 o The discretionary application of media access rules without clear procedural
14 safeguards violates Plaintiff's due process rights.
15 • **Monell Liability:**
16 o The exhibit shows a deliberate policy of viewpoint-based press exclusion
17 orchestrated by senior officials at the Washoe County Library System, implicating
18 municipal liability (*Monell v. Dep't of Soc. Servs.*, 436 U.S. 658 (1978)).

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23 CERTIFICATION OF EXHIBIT SUBMISSION

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25 I, Drew J. Ribar, certify that this **Exhibit 3** accurately represents the original internal
26 communications obtained from Washoe County Library System records. This exhibit is
27 submitted in compliance with **Federal Rules of Evidence 901** for authentication.

28 PLEADING TITLE - 3

1 Dated: March 17, 2025
2

3 Respectfully Submitted,

4 /s/ Drew J. Ribar
5 Drew J. Ribar, Pro Se
6 3480 Pershing Ln
7 Washoe Valley, NV 89704
8 (775) 223-7899
9 Const2Audit@gmail.com

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PLEADING TITLE - 4

From: Weinert, Beate <BWeinert@washoecounty.gov>
Sent: 24 June 2022 23:48
To: Scott, Jeff; Hemingway, Jamie; Ryan, Kristen
Subject: Re: KUNR reporter at Storytime
Attachments:

Christopher is more than happy to join you if you would like them to ☺

With Much Gratitude,
Beate

 Beate Weinert
Youth Services and Library Events Manager | Washoe County Library System
bweinert@washoecounty.gov | Office: 775.327.8361
301 S. Center Street, Reno, NV 89501

From: Scott, Jeff <jscott@washoecounty.gov>;
Sent: Friday, June 24, 2022 2:14 PM
To: Hemingway, Jamie <JHemingway@washoecounty.gov>; Weinert, Beate
<BWeinert@washoecounty.gov>; Ryan, Kristen <kryan@washoecounty.gov>;
Subject: KUNR reporter at Storytime

I'll interview with the reporter. Not sure if Ginger Devine wants to be interviewed?

Thoughts on if it is too chaotic afterward?

Thanks

EXH 011

Jeff

Jeff Scott
Library Director
Washoe County Library System
301 S. Center St. Reno, NV 89505
(775) 327-8340
jscott@washoecounty.us

From: Jose Davila IV <jose@kunr.org>
Sent: Wednesday, June 22, 2022 3:23:11 PM
To: Scott, Jeff <jscott@washoecounty.gov>
Subject: Drag Queen Story Time

[NOTICE: This message originated outside of Washoe County -- DO NOT CLICK on links or open attachments unless you are sure the content is safe.]

Dear Director Scott,

My name is Jose Davila and I am the new K-12 education reporter at KUNR here in Reno and I was wondering if I could attend the story time session on Saturday to talk to parents and kids about the event. I saw that adults without children are (obviously!) no allowed, so I figured I would ask for your permission. Otherwise, I'd love to schedule a time to talk to you about the program. I'd love to talk to Miss Devine, too, if possible.

Please let me know your thoughts!

Best,
Jose

Jose Davila IV (he/him/his)
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EXH 612